



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

June 18, 2024

By ECF

The Honorable Paul A. Engelmayer
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records v. United States Citizenship and Immigration Services*,
23 Civ. 1997 (PAE)

Dear Judge Engelmayer:

This Office represents United States Citizenship and Immigration Services (the "Government"), defendant in this action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"). We write to inform the Court that, despite the parties' best efforts, they have been unable to resolve plaintiffs' "policy and practice" claim. The Government therefore intends to file a motion to dismiss that claim. With plaintiffs' consent, we write respectfully to propose the following briefing schedule, which accommodates counsel's vacation schedules and would provide the parties sufficient time to brief the issues:

- Opening papers due 8/16/2024
- Opposition papers due 9/13/2024
- Reply papers due 10/4/2024

We thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

The Court, having received notification from plaintiffs that they waive the right to amend the complaint once as a matter of course under Federal Rule of Civil Procedure 15(a)(1)(B), so-orders the proposed briefing schedule for the anticipated motion to dismiss.

By: /s/ Ilan Stein
ILAN STEIN
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Southern District of New York
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SO ORDERED.

Paul A. Engelmayer

PAUL A. ENGELMAYER
United States District Judge
July 22, 2024